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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH ROCHA

Defendants.

CASE NO. 1:24-CR-00081-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

IT IS HEREBY STIPULATED by and between the parties that the status conference set for March 12, 2025 at 1:00 pm before the Honorable Barbara A. McAuliffe be continued to May 14, 2025 at 1:00 p.m.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. The parties need additional time to further investigate/explore matters related to resolving the case or setting a trial date.
2. The parties anticipate that they will be prepared to select a trial date at the next status conference, or else will prior to that status conference set the case instead for change of plea.
3. By this stipulation, defendant now moves to continue the status conference, and to exclude time from March 12, 2025 to May 14, 2025.
4. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes investigative reports, and related documents, photographs, etc., in electronic form. All

1 of this discovery has been either produced directly to counsel and/or made available for
2 inspection and copying.

3 b) With respect to the additional time from March 12, 2025 to May 14, 2025,
4 defense would further like additional time for defense investigation, and the government does not
5 object to the continuance on this basis.

6 c) An ends-of-justice delay is particularly apt in this case because:

- 7 • Defendant needs additional time to conduct additional investigation.

8 d) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of March 12, 2025 to May 14, 2025,
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) because
14 it results from a continuance granted by the Court at defendants' request on the basis of the
15 Court's finding that the ends of justice served by taking such action outweigh the best interest of
16 the public and the defendants in a speedy trial.

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5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: March 5, 2025

Respectfully submitted,

MICHELE BECKWITH
Acting United States Attorney

By /s/ Robert L. Veneman-Hughes
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

Dated: March 5, 2025

/s/ Christina Corcoran
CHRISTINA CORCORAN
Attorney for Defendant JOSEPH ROCHA

ORDER

IT IS SO ORDERED that the status conference is continued from March 12, 2025, to **May 14, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv). If the parties do not resolve the case in advance of the next status conference, they shall be prepared to set a trial date at the status conference hearing.

IT IS SO ORDERED.

Dated: **March 5, 2025**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE